

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GEORGE TOWN ASSOCIATES S.A.,

Plaintiff,

v.

ABAKAN, INC. and MESOCOAT, INC.,

Defendants.

Case No. 15-CV-3435 (DLC) (JLC)

**DECLARATION OF DOUGLAS GROSS IN SUPPORT OF
PLAINTIFF'S MOTION FOR CONTEMPT AND APPOINTMENT OF RECEIVER**

I, Douglas Gross, hereby declare under penalty of perjury as follows:

1. I am an attorney of Goetz Fitzpatrick LLP, counsel for Plaintiff George Town Associates S.A. ("George Town" or "Plaintiff") in the above-referenced action. I make this declaration in support of Plaintiffs' Motion to for Contempt and Appointment of Receiver.

2. Attached hereto as **Exhibit A** are true and correct copies of press releases issued by Defendant Abakan, Inc. and Defendant MesoCoat, Inc. dated July 27, 2015.

3. Attached hereto as **Exhibit B** is a true and correct copy of the *curriculum vita* of Robert W. Seiden.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 28, 2015

By:


Douglas Gross